

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Miami Division
CASE NO.: 00-6273-CR-HUCK / GARBER

UNITED STATES OF AMERICA,
Plaintiff,

vs.

ADAM TODD SILVERMAN,
Defendant.

**DEFENDANT SILVERMAN'S MOTION FOR AUTHORIZATION TO
EXPEND FUNDS TO OBTAIN ESSENTIAL DISCOVERY MATERIAL**

COMES NOW the Defendant, ADAM TODD SILVERMAN, through undersigned appointed counsel, and files this motion requesting advance authorization to expend CJA funds to obtain essential discovery and, in support thereof, states as follows:

1. Undersigned counsel has been appointed to represent the Defendant, Adam Silverman, pursuant to the Criminal Justice Act.
2. As this Court is aware, the Defendant has been charged in a 25 Count Indictment with eight other individuals with racketeering spanning a six year period. The pattern of alleged racketeering activity consisted of multiple acts or threats involving murder, extortion, extortionate extensions of credit, financing extortionate extensions of credit,

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w/c

collection of extensions of credit by extortionate means, fraud, bank fraud, theft from interstate shipments, interference with commerce by threats or violence and obstruction of justice

3. Undersigned counsel has been advised by the Government that the discovery in this case is voluminous, consisting of approximately 3,000 documents, 74 audio tapes, 17 CD ROMs and one video.
4. Further, the government advises that this Discovery is in the possession of International Legal Imprints and available for Defendant at an estimated cost of \$1,500.00.
5. Undersigned counsel has previously requested authorization to expend these funds to obtain the essential discovery materials pursuant to the Criminal Justice Act as indicated by the attached letter and memorandum to this Court under date of February 5, 2001. (Exhibit "A"). As of the date of this Motion, undersigned counsel has not yet received a response.

WHEREFORE, based upon the above and foregoing, the Defendant, ADAM TODD SILVERMAN, respectfully requests that this Court grant the relief herein sought.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished by mail on this 7th day of March, 2001, to the following:

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Assistant U.S. Attorney
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Fort Lauderdale, Florida 33301

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Fort Lauderdale, Florida 33316

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(atty for Trentacosta)
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Coral Gables, Florida 33134

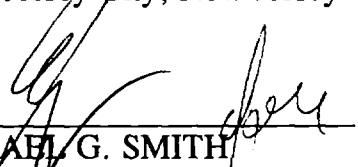
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February 5, 2001

The Honorable Paul C. Huck
United States District Court Judge
301 North Miami Avenue
Miami, Florida 33132

**RE: United States v. Adam Silverman
Case No.: 00-6273-CR-HUCK / GARBER**

Dear Judge Huck:

Please find enclosed a proposed Memorandum For Authorization For Funds to Obtain Essential Discovery Materials. As you may be aware, discovery in this case is voluminous consisting of approximately 2,000 documents, 74 audio tapes, 17 CD ROMs and one video. As explained in the Memorandum, all of this material is essential to the proper and adequate preparation of the defense.

With this letter, I am requesting this Court Petition the Eleventh Circuit for advance authorization to expend up to \$1,500.00 in copying costs to obtain essential discovery. Should the proposed Memorandum meet with your approval please execute and forward to the appropriate parties. If you require any changes or any further information, please contact my office.

Very truly yours,



Michael G. Smith, Esquire
MGS/pb
Enclosure - 2 pages

DEFENDANT SILVERMAN'S MEMORANDUM
FOR AUTHORIZATION FOR FUNDS
TO OBTAIN ESSENTIAL DISCOVERY MATERIALS

TO: Chief Judge R. Lanier Anderson, III or his representative
FROM: United States District Judge Paul C. Huck
DATE: February 5, 2001
SUBJECT: Advance Authorization for Funds to Obtain Essential Discovery Materials.

It is requested that advance authorization be granted to obtain essential Discovery materials in excess of the maximum allowed under the provision of subsection (e)(3) of the Criminal Justice Act, Title 18, U.S.C. § 3006A, as follows:

Case Name: United Stated v. Adam Silverman (Southern District of Florida)
Case No.: 00-6273-CR-HUCK / GARBER
Copy Service: International Legal Imprints
150 Southeast Second Avenue
Suite 800
Miami, Florida 33131

Reason for Application:

The Defendant has been charged in a 25 Count Indictment with eight other individuals with racketeering spanning a six year period. The pattern of alleged racketeering activity consisted of multiple acts or threats involving murder, extortion, extortionate extensions of credit, financing extortionate extensions of credit, collection of extensions of credit by extortionate means, fraud, bank fraud, theft from interstate shipments, interference with commerce by threats or violence and obstruction of justice.

Counsel has been advised by the government that all discovery materials are in the possession of International Legal Imprints and are available to the Defendant for copying. Discovery in this case presently consists of approximately 2,000 documents (transcripts), one video, 74 audio cassettes, and 17 CD ROMs. All of this material is essential

discovery as it contains either conversations by the Defendant and/or by other persons discussing the Defendant and/or his alleged involvement in this case. All materials must be carefully reviewed for accuracy and content in order to properly and effectively prepare the defense of this case.

Estimated costs:

2000 pages @ .15 = \$300.00

1 video @ \$20.00 = \$20.00

74 audio cassettes @ \$5.00 = \$370.00

17 CD ROMs @ \$45.00 = \$765.00

Total Estimated Costs = \$1,500.00

I certify that the estimated compensation in excess of the amount set forth in Title 18, U.S.C. § 3006A(e)(3) appears necessary to provide fair compensation for services of an unusual character and therefore recommend approval of this advance authorization in the amount of \$1,500.00.

PAUL C. HUCK
U.S. DISTRICT COURT JUDGE

Date

Advance Authorization in the amount of \$ _____

Chief Judge, United States Court of Appeals
(or Delegate)

Date

